

County of Imperial
Agricultural Commissioner
150 South Ninth Street
El Centro, CA 92243

June 11, 2003

To: Environmental Justice Implementation Plan Reviewers
From: Stephen L. Birdsall, Imperial County Agricultural Commissioner
Subject: Comments on DPR's Draft Environmental Justice Policy

DPR's draft environmental justice policy overlooks the most effective tool in ensuring that California allows the beneficial uses of pesticides to our society by utilizing a strict and comprehensive pesticide regulatory program which embraces a scientific approach because the beneficial use of pesticides depends upon accurate information and sound judgement. Scientific knowledge of pesticides continually evolves and improves and should never be replaced by public opinion. DPR stressed the need for utilizing a scientific approach in developing their world class pesticide regulatory program in their publication *California Department of Pesticide Regulation - Protecting People and the Environment* published in 2001. It includes a mandate from Governor Davis "to use good science and enforce the law". The value and need for sound science should be clearly incorporated in this policy. DPR's environmental justice policy should include assurance that the benefits and protections provided by pesticides in controlling pests, preventing disease, etc. that may not be afforded to all races, cultures, and incomes equally will be assured through this policy.

Finally, on page 5 of this document, DPR includes a long list of goals and improvements that need to be taken by the CAC's to ensure the enforcement program protects all people. The wording strongly suggests that we are not currently doing these things which is probably not accurate and certainly is poorly worded.